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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

NEETA THAKUR, <i>et al.</i> ,)	Case No. 25-cv-4737-RFL
Plaintiffs,)	
v.)	DECLARATION IN SUPPORT OF FEDERAL
)	DEFENDANTS' ADMINISTRATIVE MOTION
)	FOR A STAY IN LIGHT OF LAPSE OF
)	APPROPRIATIONS
DONALD J. TRUMP, in his official capacity as)	
President of the United States, <i>et al.</i> ,)	Judge: Hon. Rita F. Lin
Defendants.)	
)	
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)	

I, Jason Altabet, declare as follows:

1. I am a Trial Attorney at the Federal Programs Branch in the United States Department of Justice, Civil Division. I have personal knowledge of the matters set forth below, except those matters that are based on information and belief, which I believe to be true, and could and would testify

1 competently to them if called to do so. I make this declaration in support of the Federal Defendants'
2 Unopposed Administrative Motion, filed concurrently herewith.

3 2. I have been informed that I will be furloughed for the duration of the lapse in
4 appropriations. I am also informed that Counsel Barragan will be furloughed for the duration of the
5 lapse in appropriations.

6 3. On October 1, 2025, I contacted Plaintiffs' counsel regarding a potential stay motion.
7 Plaintiffs' counsel and I discussed this matter over the phone and then over email. Plaintiffs' counsel
8 represented that Plaintiffs would graciously not oppose a 7-day stay of DoD's and NIH's obligations in
9 the manner set forth in the administrative motion as well as a 7-day stay of the present October 10
10 deadline for an additional status report on compliance.

11 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
12 correct. Executed on October 2, 2025.

13 /s/ Jason Altabet
14 Jason Altabet
15 Trial Attorney, Federal Programs Branch
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